

Attachment 6

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March 10, 2009

Catrice C. Williams, Secretary
Department of Telecommunications & Cable
Commonwealth of Massachusetts
Two South Station
Boston, Massachusetts 02110

**Re: DTC 08-9– Petition of Intrado Communications Inc. for Arbitration
Pursuant to Section 252(b) of the Communications Act of 1934**

Dear Secretary Williams:

Enclosed for filing in the above-referenced proceeding is Verizon's Motion for Abeyance.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alex Moore".

Alexander W. Moore

cc: Service List

**BEFORE THE
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

In the Matter of the Petition of Intrado)	
Communications Inc. for Arbitration)	
Pursuant to Section 252(b) of the)	DTC 08-9
Communications Act of 1934, as Amended)	
To Establish an Interconnection)	
Agreement with Verizon New England)	
Inc. d/b/a Verizon Massachusetts.)	

VERIZON'S MOTION FOR ABEYANCE

Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon") asks the Department to hold this arbitration in abeyance pending a ruling in the Intrado/Verizon Virginia arbitration now before the FCC's Wireline Competition Bureau ("Bureau").¹ The issues in that arbitration are nearly identical to the issues in this case. In addition, as Verizon discussed in its Initial Brief in this case (at 3-4), the Bureau intends to first decide the threshold issue of whether Intrado is even entitled to section 251(c) interconnection with Verizon (and Embarq).

The Bureau's target date for a decision is May 2, just three weeks after the April 10 date for decision in this case.² The Bureau's decision is expected to provide useful guidance on the same issues now before the Department and other state commissions.

¹ *Petition of Intrado Communications of Virginia Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Arbitration of an Interconnection Agreement with Central Telephone Company of Virginia and United Telephone – Southeast, Inc. (collectively, Embarq), WC Docket No. 08-33; Petition of Intrado Communications of Virginia Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Arbitration of an Interconnection Agreement with Verizon South Inc. and Verizon Virginia Inc. (collectively, Verizon), WC Docket No. 08-185 (consolidated by Order released Dec. 9, 2008, FCC No. DA 08-2682).*

² In its Initial Brief in this case, Verizon mistakenly stated that the scheduled decision date in this case was April 17, rather than April 10.

Indeed, Verizon and Intrado have already agreed to abeyances of their arbitrations in North Carolina and Delaware pending the Bureau's decision.³

If the Department issues its decision in this case before the Bureau rules, and if that decision is inconsistent with the Department's ruling in this arbitration, it is likely that Verizon and/or Intrado will ask the Department to modify its decision. The most efficient course for the parties and the Department is, therefore, to grant a brief abeyance pending the FCC Bureau's ruling. Once the Bureau issues its ruling, Verizon and Intrado could notify the Department within 10 days after its issuance how they would like to proceed with the instant arbitration. This is the same agreement Intrado and Verizon reached in Delaware and North Carolina. Verizon sought a similar agreement with Intrado in Massachusetts, but Intrado was not willing to hold the arbitration here in abeyance.

However, the parties have previously agreed to extend the ninth-month period for decision in this arbitration by stipulating to a start date for negotiations,⁴ and the Department could request that the parties' agree to stipulate to another start date so as to provide for a ruling after the Bureau decision is issued, thus allowing efficient use of Department resources.

³ *Petition of Intrado Comm. Inc. for Arbitration with Verizon South Inc. d/b/a Verizon North Carolina*, Docket No. P-1187-Sub 3, Joint Motion to Hold the Arbitration Proceeding in Abeyance (N.C.U.C., filed March 4, 2008); *Petition for Intrado Comm. Inc. for Arbitration Pursuant to Section 252(b) of the Comm. Act of 1934, as Amended, to Establish an Interconnection Agreement with Verizon Delaware LLC*, Docket No. 08-61 (Del. P.S.C., filed March 4, 2009). The procedural schedule in Intrado's arbitration with Verizon in Illinois has also been suspended pending a Commission ruling on the Administrative Law Judges' recommendation to dismiss the Intrado/AT&T arbitration because Intrado is not entitled to interconnection under section 251(c) of the Telecommunications Act of 1996. See Verizon Initial Brief at 2.

⁴ See Joint Motion Concerning Deadline for Arbitration Decision, filed in this docket on December 18, 2008.

Respectfully Submitted,

VERIZON NEW ENGLAND INC.

By its Attorneys,

A handwritten signature in black ink, appearing to read "Alex Moore", written over a horizontal line.

Alexander W. Moore

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Dated: March 10, 2009